

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO ex rel.,
State Engineer,

Plaintiff,

vs.

No. 69cv07941-BB-ACE
RIO CHAMA STREAM SYSTEM
Section 7

ROMAN ARAGON, et al.,

Defendants.

RESPONSE TO MOTION FOR SANCTIONS

COMES NOW Henry Coors for his Response to Motion for Sanctions states:

1. The issue in this case appears to be whether Mr. Coors received effective notice of the hearing which resulted in a default judgment on October 11, 2004.
2. As shown by the Affidavit of Henry Coors (attached as Exhibit A), Mr. Coors was traveling in a motor home during the time period in question and did not receive actual notice of the hearing.
3. Accordingly, Coors and his counsel, Walter Reardon, believe that it would not be appropriate to grant sanctions against him or his counsel under the facts of this case.

WHEREFORE, Coors prays that the Motion for Sanctions be denied and for such further relief as is just and proper.

WALTER L. REARDON, JR., P.A.

Electronically filed

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We hereby certify that a copy of the foregoing pleading was sent by the method(s) indicated below to the person(s) and indicated address(es) listed below on the 10th day of July, 2005. If by facsimile or email, the transmission was reported as complete and without error.

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